"Green Agenda: Air Pollution"

Prepared for Working Group F by

European Fund for the Balkans

The input paper has been prepared by the "Balkans United for Clean Air network", that currently includes its founding members: European Fund for the Balkans, Right to the City, Renewables and Environmental Regulatory Institute and, the Belgrade Open School (Belgrade, Serbia), Environmental and Territorial Management Institute (Tirana, Albania), Ekoforum (Zenica, Bosnia and Herzegovina), Centre for Ecology and Energy (Tuzla, Bosnia and Herzegovina), Sbunker (Pristina, Kosovo), Air Care (Skopje, North Macedonia) and OZON (Podgorica, Montenegro) and the Balkan Green Foundation.

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Introduction

The Western Balkans is Europe's most polluted area when it comes to air pollution. Its 16 power plants produce more air pollution than the 250 power plants of the EU combined. During winter months, the region's larger cities regularly become some of the most polluted cities on earth.

In November 2020, Western Balkans leaders signed the Green Agenda under the framework of the Berlin Process. The five pillars of the Green Agenda acknowledge the European Green Deal as the EU´s new growth strategy toward a modern, climate neutral, resource-efficient, and competitive economy. Western Balkans leaders committed to working toward the 2050 carbon-neutrality target together with the EU by supporting the progressive decarbonization of the energy sector, phasing out coal subsidies, and participating in the Coal Region in Transition initiative for the Western Balkans. However, the Green Agenda is an ambitious document, and the framework of the Berlin Process needs to be used for its implementation, as the current situation is far from promising.

The Western Balkans region faces major difficulties as it aligns with EU environmental standards and long-term climate and energy policy goals. Environmental governance is obstructed by corruption, ineffective law enforcement mechanisms, and the lack of reliable data on the state of the environment. Although they are on the EU accession paths to varying degrees, with a large portion of EU environmental acquis already adopted, Western Balkans countries (WB6) suffer from overwhelming air pollution, particularly in urban areas, as well as inefficient electricity consumption and high carbon emissions from power generation relative to total generation. Coal-fired power plants constituted 61% of total electricity production in 2019. Therefore, phasing out fossil-fuel electricity production

and achieving climate neutrality by 2050 will be a very challenging task.

The main sources of air pollution[1] in WB6 include the power sector, individual households (considered responsible for the largest portion of particular matter (PM) emissions), and the energy-intensive industry. The power sector is a significant emitter of sulfur dioxide (SO2), PMs, and heavy metals, while energy-intensive industry contributes to the emergence of contaminated sites throughout the region.

According to WHO data, air pollution accounts for 13,500 premature deaths in the region every year. In addition to the sources of pollution listed above, these deaths are also a result of the long-term neglect of adopted EU rules, violations of the Treaty Establishing the Energy Community, and a lack of accountability and law enforcement mechanisms. Such circumstances create an environment that favors state-owned power companies and private investors, allowing them to maintain their businesses despite obvious violations of air protection standards and exceeded emission ceilings. Unsustainable use of energy, energy intensity, and air pollution diminish economic growth, prevent poverty reduction, and limit human development in the region.

More background information about the impacts of air pollution on health, the importance of proper monitoring and information systems, as well as the share of big polluters can be found in the attached compendium of the Balkans United for Clean Air network.

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[1]
https://www.worldbank.org/en/region/eca/publication/air-quality-management-in-western-balkans

The third pillar of the Green Agenda explicitly targets depollution, and focuses on air pollution in addition to water and soil pollution. Each country signed the following text:

"Depollution of air, water and soil in the Western Balkans is our joint interest stemming from our primary concern for the health of our citizens. Therefore, we commit to the following actions:

- *Finalise the process of ratification of Convention on Long-range Transboundary Air Pollution and its protocols (including amendments) in each of Western Balkan economies;*

- *Develop and implement Air Quality Strategies and increase the uptake of Best Available Techniques in accordance with the Industrial Emissions Directive;*

- *Establish an adequate air quality monitoring system, including through accreditation of air quality monitoring networks."*

EU support for the Green Agenda for the Western Balkans can also be viewed through a geopolitical lens of the entire region, with the involvement of Russia, the US, and China as strong political and economic actors in the region. Especially Chinese projects are regularly implemented without respect to competition rules and without public tenders. As mainstream international investors stopped financing coal-related projects, a new space for Chinese investments was opened. Therefore, any delays in the adoption and proper implementation of EU green policy goals and acquis will be an even heavier burden for the weak and inefficient WB6 administrations.

Although neither the signed Sofia Declaration on the Green Agenda nor the EC Guidelines for the Implementation of the Green Agenda for the Western Balkans explicitly refer to civil society involvement, bearing in mind everything mentioned above, this should be a crucial element of its implementation and success.

Turning now to the status of what has been signed under the Sofia declaration on the Green Agenda for the Western Balkans regarding air quality and depollution:

Finalise the process of ratification of Convention on Long-range Transboundary Air Pollution and its protocols (including amendments) in each of Western Balkan economies:

Most WB6 countries lack a national contact point with regard to the Convention, and it should be considered whether and how the civil society could take over this role. The ratification process in each country needs to be more transparent.

With the exception of Albania, the other Western Balkan countries inherited the UN Convention on Long-range Transboundary Air Pollution (CLRTAP) from the former Yugoslavia, but are yet to appoint a national focal point for CLRTAP21. Some obligations were derived from the Energy Community Treaty. Still, some WB6 countries are failing to fulfill them, which has already led to penalties for Bosnia and Herzegovina from the Energy Community. Kosovo is not a member of the UN, therefore it has not officially signed the CLRTAP and its implementation is currently not in effect. However, the air pollution stemming from Kosovo's two outdated coal power plants often crosses the borders to its neighbours.

Develop and implement the Air Quality Strategies and increase the uptake of Best Available Techniques in accordance with the Industrial Emissions Directive:

Air Quality Strategies in the Western Balkans

Bosnia and Herzegovina

Environmental protection strategies, including air quality strategies for Bosnia and Herzegovina, are in preparation stages. There will be one national strategy and three entity strategies with regards to the Federation BH, Republika Srpska and Brčko District. Previous plans to create the ministries' strategic documents were abandoned when Sweden decided to fund and coordinate the process as a donor, restarting the process.

Montenegro

Montenegro has also begun preparing its Air Quality Strategy. The installed working group includes representatives from the expert community and civil society.

Serbia

Serbia has not prepared a national air quality strategy, despite being legally obliged by the Law to do so since 2015, and its air quality enforcement mechanism is ineffective. Key polluters such as the heavy industry and power sectors are not subject to legal or social responsibility. Cities with over-polluted air lack air quality plans or have adopted them with significant delays. Those in place lack appropriate pollution reduction measures and are not established upon reliable data or properly examined key sources of pollution. Public participation in air quality plans is missing.

North Macedonia

North Macedonia has had a vague Air Quality Strategy in place since 2018. Its strategy lacks a clear timeframe, indicators, and responsibilities. Demands by CSOs for tracking mechanisms of pollution have thus far been ignored.

Albania

Albania adopted an Ambient Air Quality Strategy in 2014. The strategy was prepared within an IPA-financed EU project. It sets policy objectives and options to further improve air quality in Albania. Unfortunately, the Ambient Air Quality Strategy is still not fully implemented.

Kosovo

Kosovo adopted an Air Quality Strategy for the 2013-2022 period; however, its implementation is lagging behind. Factors contributing to the lack of implementation include the lack of an approved concrete Air Quality Action Plan and a lack of implementation requirements related to air quality assessments. Furthermore, no practical implementation plans have been developed - neither municipality plans nor local implementation action plans - and the implementation of the Air Quality Strategy has remained unfulfilled.

Best available techniques (BATs)

During the EU accession process, the EU and the Western Balkans region should not waste resources for developing or translating EU best available techniques (BATs). It would be more efficient to introduce original EU BATs as a legal obligation and improve the implementation rate. The Federation of Bosnia and Herzegovina serves as a good example as it has introduced the formulation "if there are no national BATs, EU BATs apply." Environmental permits and national regulations should be based on BATs and comply with the Industrial Emmission Directive (IED) to the greatest possible extent. The EU industry's adaptation to IED provisions was primarily supported by EU funds. Therefore, similar funds should be made available to the WB6 enterprises to avoid the region becoming a safe haven for dirty industry.

Establish adequate air quality monitoring systems, including through accreditation of air quality monitoring networks:

Every country approaches air quality monitoring systems differently. There is no unified system to track both PM particles and other pollutants consistently and in real-time. Governments implement their own systems, some of which are quite outdated and cover only 10-20% of the country's territory. The low number of monitoring stations correlates with citizens' lack of awareness about the importance and state of play of air quality. The low number of sensors leads to a lack of data and, in consequence, less information for citizens. Below, the systems each of the countries has are assessed along with what can be done to improve them.

Albania

Albania has the biggest deficits compared to all its neighbors in the region. It is the only country in Europe that has no real-time open data about air quality. While civil society has tried to access available data in order to inform the public, Albanian institutions have not made this information and data available nor enabled data transparency. There are only seven air quality stations which carry out uninterrupted monitoring. For two years, two of the stations have not been in working condition. All stations are unaccredited, some of them uncalibrated, which clearly demonstrates the low level of reliability of the data they present.

North Macedonia

North Macedonia has had a monitoring system since the early 2010s, and it was donated entirely by other countries. These approximately 20 stations are quite old and therefore prone to failure, breaking down multiple times a year. Not all stations have the necessary sensors to measure all types of pollutants (PM10, PM2.5, SO, CO, NO2…), and together with missing data from non-functioning sensors, this results in an incomplete picture of the air quality. Altogether, this leads to difficulties tracking whether a new policy or measure is producing the right results.

Volunteer sensors are present from multiple networks (Sensor.community, Pulse.eco), which add more data to the fractured government puzzle, but these sensors can be unreliable in more humid weather conditions. To counter this, the Goce Delchev University has set up some ten measuring stations of its own, with higher-grade equipment, that are much more reliable. An air pollution reduction plan was introduced by North Macedonia in 2018, yet almost none of its 9 points ever came to life. The plan lacked concrete action points, deadlines, and responsibilities. Currently, North Macedonia has no national plan for the reduction of air pollution emissions.

Kosovo

After the U.S. Embassy in Pristina installed a sensor which showed extreme pollution, the country's awareness on this issue has sharply increased. As a result, Kosovo now has 13 governmental measuring stations, stretched across the country, the majority of them active, except for two. Apart from the state-run measuring stations, there is a large network of independent stations. The presentation of available data is accessible online and in real-time via https://airqualitykosova.rks-gov.net/en/ and requires basic knowledge to be read and understood. It's worth noting that there are considerable differences between the independent and state-run measurement points.

Air pollution from thermal power plants and coal-based household heating is significant. Kosovo has failed to comply with the provisions of the National Emissions Reduction Plan, and emissions ceilings for SO2, NOx and PMs are exceeded.

Serbia

Serbia has approximately 40 automatic air quality monitoring stations (AQMS). Nevertheless, a large number of cities are not equipped with AMQS. Most of the stations do not cover all relevant pollutants, and the availability of real-time data is low. In 2011, data availability was at the required rate of 90%, but in 2017 it was reduced to 22%. In 2019, this rate significantly increased to 85% from the results of 33 AQMS.[2] Albeit inconsistent and insufficient, the AMQS data provides a clear picture of high and persistent air pollution, particularly in urban areas. In 2019, the annual limit value for suspended particles (PM10) was exceeded in 13 cities and the tolerance value for PM2.5 reached the annual limit value, as well.

Not all stations are able to track all relevant pollutants, and they are usually concentrated around major cities, missing smaller towns with industrial facilities around the country. AQMS data is presented in a clear way via both the

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[2]

http://www.sepa.gov.rs/download/izv/Vazduh_2019.pdf, page 4.

website and the government app. An API (Application Programming Interface) for open data is available and documented. A good number of volunteer stations are also present.

Bosnia and Herzegovina

Bosnia and Herzegovina has a fractured air quality monitoring system. Since there is limited national coordination or none at all, cities and municipalities are left on their own to set up and maintain monitoring stations. Different types of sensors, lack of cooperation and harmonisation of the air quality monitoring system, and even different data representation models lead to heterogeneous data, more expensive maintenance and calibration of measuring instruments, and confused citizens. A number of attempts to establish a nationwide air quality monitoring system, mainly by the civil society, foreign embassies, and international organizations, have thus far failed. None of them could overcome the existing limitations and obstacles. Reaching a consensus on the Air Quality Index methodology, data collection, and representation is very difficult.[3] There is an apparent lack of institutional capacities and political resolve to establish a functional and informative system.

Apart from air quality, there is also a need to establish a sustainable system of air pollutant release inventory, which could provide relevant and up-to-date data on emissions from different sources. Clear budgetary allocation is needed, as project financing did not lead to long-term results. It is therefore very hard to determine the dominant sources of air pollution, making a prioritization of actions almost impossible. This complex situation is to the advantage of polluters, who always have an available excuse not to act, concealing their emission rates behind the obscured and incomplete databases.

Montenegro

Of all Western Balkans countries, Montenegro has the least amount of open-air pollution data. At the time of writing, out of 8 government

stations, only three were functioning. Volunteer stations are non-existent, which renders the overview of air quality monitoring very difficult. An API for open data has not been documented.

Regional perspectives

The secretariat of the Energy Community opened dispute settlement procedures against 4 of the 6 Western Balkan countries, namely against Bosnia and Herzegovina, Kosovo, North Macedonia, and Serbia for not meeting their National Emission Reduction Plans (NERP) ceilings for the reporting years 2018 and 2019. NERPs are an instrument to comply with the Large Combustion Plants Directive.

Taking into account lacking monitoring systems, it could be assumed that the pollution situation is even worse than is visible now.

Decarbonization & EU Emission Trade Scheme (ETS)

Although all countries of the region have confirmed their commitment by signing the Green Agenda, only North Macedonia has concrete plans in place for a coal phase-out by 2030. In its Strategy for Energy Development until 2040, the Macedonian government considers two options with exit scenarios by 2025, and a third back-up option delaying the closure of the Bitola lignite power plant until 2040.

On the contrary, Serbia is not preparing an energy transition through coal phase-out. Low-quality lignite dominates the power sector making up 70% of the total electricity production capacities. Serbia has also failed to comply with provisions of the Large Combustion Plants Directive, particularly due to significantly high SO_2 emissions from state-run thermal power plants (TPPs). Serbian TPPs emitted 300,000 tons of SO_2 annually in the 2018-2020 period, exceeding the 55,000 ton limit defined by National Emissions Reduction Plan. The Draft National Spatial Plan provides

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[3] Examples of fractional and incomplete attempts include: https://hidrometeo.ba/, https://zrakubih.ba/, https://zrak.ekoakcija.org/

a framework for the construction of new 3.3GW coal power plants, which could significantly jeopardize efforts within the Green Agenda framework for the Western Balkans. Bosnia and Herzegovina also has plans to construct a new coal power plant.

In comparison, a significant number of EU countries have announced their coal phase out with only a few not discussing a coal phase out yet.[4] Furthermore, by implementing the Large Combustion Plant Directive since 2001, the EU has made coal power plants much cleaner and reduced SO2, NOx, and PM emissions from large combustion plants.

ETS is a good instrument to protect both the climate and the environment. However, without a very clear understanding of responsible institutions and concrete emission reduction activities, this could bear enormous costs for state budgets. It is therefore of utmost importance that all commitments and actions of the WB6 governments are made transparent. The civil society will continue to monitor the implementation and advocate for a higher level of accountability.

What next?

The current state-run monitoring systems need to be replaced with a much higher number of modern sensors capable of measuring all types of pollutants in order to get an accurate picture of the situation. It is important that this data is made available in real-time to the public. Application Programming Interfaces (API) need to be created, better documented, and made available to the public, too. Air quality monitoring instruments and planning need to be adopted, including those pertaining to system calibration and operation. In-country staff's technical expertise also needs to be improved.

Air Quality Strategies need to be drafted urgently and, where available, Air Quality Action Plans need to be implemented. Capacities of institutions responsible for air quality need to be increased and public awareness must be raised.

Transparency and public awareness are the most important tools for increasing accountability. In functioning democracies, it is essential to make all processes and investments transparent. Public awareness is one tool to increase the demand for the right to healthy air. One successful example is the Balkans United for Clean Air campaign, which aimed to inform citizens about the consequences of air pollution by translating complex technical facts into accessible language. Its regional focus nurtured regional solidarity by highlighting that we are all in this together and that sustainable solutions can only be found through joint efforts. Until then, we will continue to share the toxic cloud among ourselves.

The campaign topics covered causes and consequences of air pollution, increased mortality, in particular in relation to the COVID-19 pandemic, increased infertility as a consequence of air pollution, the impact of industry and large polluters, and the necessity of official air quality monitoring. The initial nine organisations that kicked off the campaign managed to reach more than 650,000 people on social media, to have different topics covered by traditional media in more than 500 articles and interviews, and include more than 520 organisations and individuals as part of the campaign.

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[4] https://beyond-coal.eu/coal-exit-tracker/?type=maps&layer=4

Questions for the working group

The expert community and civil society across the Western Balkans know the current situation well. They have the required knowledge and need to be included in the implementation of the Green Agenda.

- How can this be ensured at the national and regional level?

- How can the RCC help at the regional level?

- Which regional mechanisms for CSO inclusion can be introduced to guarantee the monitoring of governments' national and regional obligations derived from the Green Agenda?

- How can the Berlin Process and its mechanisms be used on a substantial level? How can the Berlin Process help civil society actors make their governments accountable?

- How can an independent accountability mechanism be developed for the purpose of Green Agenda progress monitoring? What are the tools available to civil society for ensuring transparency and accountability? How will transparent monitoring of strategic document implementation be guaranteed?

- How can the Berlin Process and the Green Agenda help empower and monitor governments to set up reliable, timely and easy-accessible pollution data?

- What are the financial needs for proper implementation of the Green Agenda? How will this be monitored?

- Are there financial instruments for regional CSO networks to support the Green Agenda implementation? How could CSO national and regional cooperation, information, and knowledge exchange be supported?

- How could access to media be supported, taking into account the situation in many of the Western Balkans countries?